

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
vs.)
TRAVIS GENE SLOAT,)
Defendant.)
Case No.: CR-23-005-Raw

DEFENDANT'S PROPOSED JURY INSTRUCTIONS

COMES NOW, Defendant Travis Gene Sloat, by and through his attorney of record, Matthew R. Price, and moves specifically request certain jury instructions as follows:

1.33

LESSER INCLUDED OFFENSE

If you unanimously find the defendant not guilty of the offense charged, or if, after all reasonable efforts, you are unable to agree on a verdict as to that offense, then you must determine whether the defendant is guilty or not guilty of Video Voyeurism.

The difference between these two offenses is that, to convict the defendant of Video Voyeurism, the government does not have to prove that the victim was under the age of 18 or that the visual depiction was of sexually explicit conduct. This is an element of the greater offense, but not of the lesser included offense.

For you to find the defendant guilty of Video Voyeurism, the government must prove each of the following elements beyond a reasonable doubt:

Whoever, in the special maritime and territorial jurisdiction of the United States, has the intent to capture an image of a private area of an individual

without their consent, and
knowingly where individual has a reasonable expectation of privacy

If you are convinced that the government has proved
all of these elements beyond a reasonable doubt, you may
find the defendant guilty of the lesser included offense. If
you have a reasonable doubt about any of these elements,
then you must find the defendant not guilty of the lesser
included offense.

WHEREFORE the Defendant moves this Court include these instructions for jury trial and
for any and all further relief as this Court deems appropriate.

Dated June 6, 2023

Respectfully submitted,

s/ Matthew R. Price
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Certificate of Service

X I hereby certify that on June 6, 2023, I electronically transmitted this
document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the
records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing
to those registered participants of the ECF System.

s/ **Matthew R. Price**